OBSERVATION REPORT #13

Numerous metrics in the New Jersey June and July 2000 Carrier-to-Carrier Reports deviate from the New Jersey Carrier-to-Carrier Guidelines (May 2000), lacking required data and other elements.

Issue

The New Jersey Carrier-to-Carrier Guidelines (May 2000) outlines the reporting requirements of the Carrier-to Carrier Report to be generated by Verizon (VZN) on a monthly basis. KPMG Consulting has found discrepancies between these Guidelines and the June and July 2000 Carrier-to-Carrier Reports.

The tables below list the metrics that were missing from the report (Table 1), products that were missing from the report (Table 2), metrics that were incorrectly included in the report (Table 3), metrics that were reported as Under Development (UD) when they should have been available (Table 4) and metrics that contained standards on the report that did not comply with the New Jersey Carrier-to-Carrier Guidelines (Table 5).

Where relevant, the documents used to assess this observation include: the May 2000 New Jersey Carrier-to-Carrier Guidelines, the June and July 2000 New Jersey Carrier-to-Carrier Reports, the 07-25-00 Report Status 2, and Docket Nos. TX98010010 and TX95120631 (including Appendix A and B).

Table 1: Metrics that were missing from the Carrier-to-Carrier Reports

Domain	Metric	Metric Description	Issue
BI	BI-8-02	% Completeness of Non-Recurring Charges	This metric was missing from the June 2000 Carrier-
		– Excluding Order Activity Post Completion	to-Carrier Report.
		Discrepancy Delayed Charges	

Table 2: Date elements were missing from the Carrier-to-Carrier Reports

Domain	Metric	Metric Description	Issue
OR		1 , ,	The Verizon average was missing from the June 2000 report but reported in July (see Table 4).
	OR-4-07	% SOP to Bill Completion >= 5 Business Days	The Verizon percentage was missing from the June 2000 report but reported in July (see Table 4).

Domain	Metric	Metric Description	Issue
	OR-4-08	<u> </u>	The Verizon percentage was missing from the June 2000 report but reported in July (see Table 4).

Table 3: Metrics that were incorrectly included in the Carrier-to-Carrier Reports

Domain	Metric	Metric Description	Issue
OR	OR-4-03	% Excluded from % On Time - Completion	This metric is listed in the NJ Carrier-to-Carrier
		Notices	Guideline as "Intentionally Omitted" but was
			included in the June 2000 Carrier-to-Carrier Report.

Table 4: Metrics that were reported as Under Development (UD) in the Carrier-to-Carrier Report, but should have been available as of June 2000, according to Appendix A and B of Docket Nos. TX98010010 and TX95120631.

Domain	Metric	Metric Description	Issue
PO	PO-1-06	Average Response Time - Facility Availability (ADSL Loop Qualification – Web GUI)	This metric was UD in June 2000. It was reported in July 2000.
OR	OR-4-06	Average Duration - Work Completion (SOP) to Bill Comp	The Verizon average was reported as UD for the July 2000 report and was not reported in June (see Table 2).
	OR-4-07	% SOP to Bill Completion >= 5 Business Days	The Verizon percentage was reported as UD for the July 2000 report and was not reported in June (see Table 2).
	OR-4-08	% SOP to Bill Completion > 1 Business Day	The Verizon percentage was reported as UD for the July 2000 report and was not reported in June (see Table 2).
	OR-8-01	% Acknowledgements on Time	This metric should have been reported for both June and July 2000.

Table 5: Incorrect Standards in the NJ June and July 2000 Carrier-to-Carrier Reports

Product	Metric	Metric Description	Issue
Pre-Ordering	PO-1-03	Average Response Time – Address Validation –	Standard should be Parity + 7 seconds.
		Web GUI	Reports show Parity + 4 seconds.
Complex	OR-1-04	% On Time LSRC < 6 Lines - Electronic	Standard should be 95% within 72 hours.
Services - 2			Reports show 95% within 48 hours.
Wire Digital & 2	OR-1-08	% On Time LSRC < 6 Lines - Fax	Standard should be 95% within 96 hours.
Wire xDSL			Reports show 95% within 72 hours.

Product	Metric	Metric Description	Issue
(Aggregated/ Disaggrated) –	OR-2-04	% On Time LSR Reject < 6 Lines - Electronic	Standard should be 95% within 72 hours. Reports show 95% within 48 hours.
RESALE/UNE	OR-2-08	% On Time LSR Reject < 6 Lines - Fax	Standard should be 95% within 96 hours. Reports show 95% within 72 hours.
POTS / Special Services – Aggregate – UNE	OR-6-03	% Accuracy – Local Service Request Confirmation	Standard should be not more than 5% LSRCs resent due to BA error. Report shows "No LSRCs resent due to VZ error".
Trunks	PR-2-09	Average Interval Completed – Total <= 192 Forecasted Trunks	Standard should be "Not greater than applicable interval stated in BA Product Interval Guide." Report shows "Parity with IXC / FGD"
Trunks	PR-2-09	Average Interval Completed – Total > 192 Forecasted & Unforecasted	Standard should be "Not greater than applicable interval stated in BA Product Interval Guide." Report shows "Parity with IXC / FGD"

Assessment

To the extent that Verizon does not populate its reports in accordance with the NJ Carrier-to-Carrier Guidelines (May 2000), Verizon is not compliant with decisions made by the NJ BPU. Additionally, with these reporting discrepancies CLECs cannot verify that they are being provided with the level of service required by the NJ Carrier to Carrier Guidelines.